

1 Maria A. Gall, Esq.
2 Nevada Bar No. 14200
3 BALLARD SPAHR LLP
4 1980 Festival Plaza Drive, Suite 900
5 Las Vegas, Nevada 89135
6 Telephone: (702) 471-7000
7 Facsimile: (702) 471-7070
gallm@ballardspahr.com

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9 *Attorneys for Plaintiff Geoff Winkler,*
10 *as Receiver for Profit Connect*

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12
13 UNITED STATES DISTRICT COURT
14
15 DISTRICT OF NEVADA

16 GEOFF WINKLER, as Receiver for
17 PROFIT CONNECT WEALTH
18 SERVICES, INC.,

19 Plaintiff,

20 v.

21 WILLIAM ROSHAK, individually and
22 d/b/a WILLIAM GEORGE
23 PHOTOGRAPHY, MELISSA ROSHAK,
24 TETIANA LUZHANSKA, DOES 1-10 and
25 ROES 1-10;

26 Defendants,

27 and

28 TINA M. LEISS, as Executive Officer of
the Public Employee's Retirement
System of Nevada,

Nominal Defendant.

Case No. 2:21-cv-002000-JCM-EJY

29
30 STIPULATION FOR EXTENSION OF
31 TIME FOR DEFENDANT MELISSA
32 ROSHAK TO RESPOND TO
33 COMPLAINT (ECF No. 1)

34
35 Plaintiff Geoff Winkler, as Receiver for Profit Connect Wealth Services, Inc.
36 and any of its subsidiaries and affiliates, and Defendant Melissa Roshak stipulate
37 and agree that Ms. Roshak has up to and including December 31, 2021 to respond to
38 the Complaint (ECF No. 1), so that Ms. Roshak may further investigate the claims in
39 the Complaint and the parties may try to enter into an early resolution of those
40 claims. Ms. Roshak was served on November 9, 2021, and the current deadline to file
41 a response is November 30, 2021. Therefore, pursuant to LR IA 6-1, this stipulation
42 is timely.

1 This is the first request for an extension, and it is made in good faith and not
2 for purposes of delay.

3 Dated: November 15, 2021

4 BALLARD SPAHR LLP

KELLEHER & KELLEHER, LLC

5 By: /s/ Maria Gall
6 Maria A. Gall, Esq.
7 Nevada Bar No. 14200
8 1980 Festival Plaza Drive, Suite 900
9 Las Vegas, Nevada 89135

By: /s/ John Kelleher
John T. Kelleher, Esq.
Nevada Bar No. 6012
40 South Stephanie Street, Suite 201
Henderson, Nevada 89012

10 *Attorneys for Plaintiff Geoff Winkler, as
11 Receiver of Profit Connect*

12 *Attorneys for Defendant
13 Melissa Roshak*

BALLARD SPAHR LLP
LAS VEGAS, NEVADA 89135
(702) 471-7000 FAX (702) 471-7070

14 **ORDER**

15 IT IS SO ORDERED:

16 
17 Layna L. Zouchak
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: November 16, 2021